

EXHIBIT 18

Case:17-03283-LTS Doc#:17476 Filed:07/22/21 Entered:07/23/21 10:23:57 Desc: Main
Document Page 1 of 1

To: Clerk,
United States District Court
Room 150 Federal Building
San Juan (Puerto Rico) 00918-1767

RECEIVED AND FILED
CLERK'S OFFICE
U.S. DISTRICT COURT
SAN JUAN, PR
2021 JUL 22 PM 4:36

San Juan Puerto Rico
July 12, 2021

From: Signa Magaly Cabrera Torres
Calle Pellín Rodríguez 372
Villa Palmeras Santurce, PR 00915
Tel. No.: 939-207-7594
Case # 12310
SS # 5242

Dear clerk,

This is to request that this honorable court reconsider my wage adjustment claim and not dismiss it, according to the order.

I would also like my claim to be secured. I have been waiting for about 10 years to be paid what is owed to me since half of my coworkers have had their debt paid in full, and I consider this to be discrimination.

I was working as a social worker in the [D]epartment of the [F]amily and I appealed as soon as I received the 25% salary adjustment because what I received was very little.
I am currently owed 75%. It is important to note that once the payment is made, a readjustment can be made to my pension, social security, and interest. In addition to evaluating the steps for recommended merits, reclassification, per diem, vacation and any other debt that remains to be paid.

For this reason, I request to continue as an active party in the Promesa Act case and that my claim be considered and reevaluated and secured so that I can be paid what is owed me for all these years.

I am enclosing evidence and I hope you can reconsider my claims and justice will be done. I trust in you and in God.

Thank you in advance,

[signature]
Signa Magaly Cabrera Torres

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**IF YOUR CLAIM IS LISTED HERE, ONE OR MORE OF THE DEBTORS ARE SEEKING
TO DISALLOW YOUR CLAIM FOR THE REASON LISTED BELOW.**

NAME	CLAIM #	DATE FILED	DEBTOR	ASSERTED CLAIM AMOUNT
CABRERA TORRES, SIGNA	12310	5/8/2018	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	\$68,000.00
Reason:	Duplicate liability filed against Debtor Employees Retirement System of the Government of the Commonwealth of Puerto Rico. All asserted liabilities, if any would be between the Claimant and the Commonwealth of Puerto Rico.			

**SI SU RECLAMO ESTÁ INCLUIDO AQUÍ, UNO O MÁS DE LOS DEUDORES SOLICITAN
QUE SU RECLAMO SEA RECHAZADO POR LA RAZÓN INDICADA AQUÍ ABAJO.**

NOMBRE	N.º DE RECLAMACIÓN	FECHA DE PRESENTACIÓN	DEUDOR	MONTO DE LA RECLAMACIÓN ALEGADA
CABRERA TORRES, SIGNA	12310	5/8/2018	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	\$68,000.00
Base para:	Reclamo de una obligación duplicada interpuesto contra el Sistema de Retiro de Empleados del Gobierno del Estado Libre Asociado de Puerto Rico. Todas las responsabilidades invocadas, si las hubiere, tendrían lugar entre el Reclamante y el Estado Libre Asociado de Puerto Rico.			

Case:17-03283-LTS Doc#:17105-2 Filed:06/18/21 Entered:06/18/21 18:59:34 Desc: Exhibit A Page 3 of 27

Three hundred forty-first Omnibus Objection

Annex A: Claims to be Dismissed

CLAIMS TO BE DISMISSED					RESIDUAL CLAIM				
NAME	DATE OF PRESENTATION	CASE/DEBTOR NO.	CLAIM NO.	AMOUNT OF CLAIM	NAME	DATE OF PRESENTATION	CASE/DEBTOR NO.	CLAIM NO.	AMOUNT OF CLAIM
6 BLASINI GALARZA, ENID D. URB SANTA ELENA 2 A15 ORQUIDEA STREET GUAYANILLA, PR 00656-1449	06/28/18	17 BK 03566-LTS / Retirement System for Employees of the Government of the Commonwealth of Puerto Rico	151099	Undetermined*	6 BLASINI GALARZA, ENID D. URB SANTA ELENA 2 A15 ORQUIDEA STREET GUAYANILLA, PR 00656-1449	06/28/18	17 BK 03283- LTS/E1 Commonwealth of Puerto Rico	151769	Undetermined*
Basis for: Claim of a duplicate obligation brought against the Employees' Retirement System of the Government of the Commonwealth of Puerto Rico. All liabilities asserted, if any, would be between the Claimant and the Commonwealth of Puerto Rico.									
CABEZOTO PEREZ, IVONNE HC-02 BOX 12180 GURABO, PR 00778	05/03/18	17 BK 03566- LTS/Retirement System for Employees of the Government of the Commonwealth of Puerto Rico	12035	\$ 13,049.50	CABEZOTO PEREZ, IVONNE HC-02 BOX 12180 GURABO, PR 00778	05/03/18	17 BK 03283- LTS/E1 Commonwealth of Puerto Rico	11829	\$ 13,049.50
Basis for: Claim of a duplicate obligation brought against the Employees' Retirement System of the Government of the Commonwealth of Puerto Rico. All liabilities asserted, if any, would be between the Claimant and the Commonwealth of Puerto Rico.									
8 CABRERA TORRES, SIGNA VILLA PALMERAS 372 STREET PROVIDENCE SAN JUAN, PR 00915-2234	05/08/18	17 BK 03566-LTS / Retirement System for Employees of the Government of the Commonwealth of Puerto Rico	12310	\$ 68,000.00	CABRERA TORRES, TORRES,	05/08/18	17 BK 03283- LTS/E1 Commonwealth of Puerto Rico	12337^	\$ 68,000.00
Basis for: Claim of a duplicate obligation brought against the Employees' Retirement System of the Government of the Commonwealth of Puerto Rico. All liabilities asserted, if any, would be between the Claimant and the Commonwealth of Puerto Rico.									
^ Claim no. 12337 also included in in Exhibit A to Omnibus Objection no. 345 for misclassified claims.									
9 CALDERON ILARRAZA, CARMEN PO BOX 1025 RIO GRANDE, PR 00745-1025	05/29/18	17 BK 03566-LTS / Retirement System for Employees of the Government of the Commonwealth of Puerto Rico	41791	\$ 30,735.45*	CALDERON ILARRAZA, CARMEN CALLE 12 T-24 VILLAS DE RIO GRANDE RIO GRANDE, PR 00745	05/29/18	17 BK 03283- LTS/E1 Commonwealth of Puerto Rico	36519^	\$ 30,735.45*
Basis for: Claim of a duplicate obligation brought against the Employees' Retirement System of the Government of the Commonwealth of Puerto Rico. All liabilities asserted, if any, would be between the Claimant and the Commonwealth of Puerto Rico.									
^ Claim no. 36519 also included in Exhibit A to Omnibus Objection no. 345 for misclassified claims.									

* Indicates that the claim contains unliquidated or undetermined amounts

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COMMONWEALTH OF PUERTO RICO
TRIAL COURT
SUPERIOR COURT OF SAN JUAN

NILDA A. AGOSTO MALDONADO, ET AL.
PLAINTIFF

V.

COMMONWEALTH OF PUERTO RICO,
DEPARTMENT OF THE FAMILY, ET AL.

RESPONDENT

CIVIL DOCKET NO. KPE 2005-0608
(907)

IN RE:

DECLARATORY JUDGMENT AND WAGE
CLAIM

JUDGMENT

The plaintiffs, listed in the addendum to this Judgment, incorporated by reference and forming an integral part hereof, are employees who hold positions with different classifications and work or have worked for the Department of the Family and its administrations: Secretariat, ADFAN, ADSEF, ASUME and ACUDEN.

The plaintiff employees filed the aforementioned lawsuit on February 23, 2005. They requested a Declaratory Judgment voiding General Memorandum 5-86 dated April 23, 1986, issued by the Central Office of Personnel Administration (OCAP), at present the Office of Human Resources of the Commonwealth of Puerto Rico (ORHELA), for being in conflict with the provisions established under the Uniform Compensation Act, Act 69 of July 12, 1979, § L.P.R.A. § 760 *et seq.* (repealed) and with the principle of equal pay for equal work, guaranteed by Art. II, Section 16 of the Constitution of the Commonwealth of Puerto Rico.

The plaintiffs claim that their salaries were affected when the Department of the Family implemented the federal minimum wage effective April 15, 1986, and subsequent increases, since the existing salary structure was rendered inoperative and a different pay system was adopted that was incompatible with the provisions of the Uniform Compensation Act, *supra*. They argue that their right to receive compensation commensurate with the duties they perform and the hierarchy, levels of responsibility and complexity of their respective positions, commensurate with the value of their work in the employment market, was violated.

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Signa M. Cabrera Torres
Appellant

CASE NO. CE-2002-12-0704

Vs.

Department of the Family
Appellee

INFORMATIVE MOTION

The undersigned appellee appears and respectfully submits and requests:

That the undersigned has been waiting since 1996 for this opportunity under the classification and compensation plan, according to the merit principle law, to have my position reclassified.

That I have made several claims regarding a reclassification as Social Worker III, as my evaluations and recommendations have requested the same.

That even without receiving this reclassification I continue to serve our clientele with the respect they deserve as well as my employer, I continue to give 100%.

That despite having so many years of (productive) service with the agency I was not considered for the position.

That the Department has in its hands a good and capable public servant.

I requested this exam for Social Worker III since all the efforts made at the agency did not bear fruit, I thought that this mechanism would be fair, where the employee can be offered opportunities to grow.

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That the undersigned meets the requirements to be able to obtain said position, due to her experience, preparation due to the training she has received, and for being a member of the Health Board of the Mothers, Children and Adolescents Program; where we seek help for our children and families.

That the undersigned encloses a copy of her evaluations and all the steps taken to claim such reclassification.

Respectfully submitted.

In Carolina, Puerto Rico June 17, 2005

[signature]
Signa M. Cabrera Torres
Alturas de Rio Grande
Calle 22V-1157
Rio Grande, P.R. 00745

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APRIL 24, 2018

*Commonwealth of Puerto Rico Claims Processing Center
c/o Prime Clerk LLC Grand Central Station
PO Box 4708 New York, N Y 10163-4708*

*PROMESA Title III
Case No. 17BK3283-LTS*

Dear Clerks:

I, the undersigned, Signa M. Cabrera Torres, of legal age, American citizen and currently retired from the Administration of Families and Children (ADFAN) of the Department of the Family of the Commonwealth of Puerto Rico, hereby state that I am part of the claimants listed as plaintiffs in the case Nilda A. Agosto Maldonado V. Commonwealth of Puerto Rico, Department of the Family and Others (Civil No. KPE 2005-0608) on Wage Claim.

I also state for the record that on September 16, 2010, the Hon. Superior Judge Rebecca de León Ríos ordered the employer to pay all the plaintiffs the wages owed, and it was not until November 2012 that we received a partial payment of 25% of said wages as reported by the Department of the Family. We the undersigned and all the plaintiffs do not know the actual amount of the debt because the Department of the Family has never shown us any calculation or official document in this regard.

For the record, I hereby submit:

- 1. Copy of the Judgment issued on September 16, 2010, by the Superior Court of San Juan ordering the payment of the wages owed to the plaintiffs with the Exhibit that includes the List of the Names of the Plaintiffs on page 17 of which my name appears at #93.*
- 2. Evidence of payment received of 25% of the debt evidenced by the document indicating the check number issued, amount of the payment received with its corresponding discounts applied.*
- 3. Letter sent on August 25, 2016, to Hon. Jesus Manuel Ortiz, Secretary Office of Public Affairs of Fortaleza requesting his intervention in order for us to be paid the remaining 75% of the salaries owed to us.*
- 4. A copy of this letter was also delivered for the same purpose to the offices of the*

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Hon. Senator Roxana López León with whom we met, to the office of Marangely Medina, Esq., Director of Labor Affairs of Fortaleza and Ms. Lilliam Pecunia, Director of Social Welfare Affairs, without any luck.

It is important to note that once the payment due to us is made, this will affect the pension and social security amounts that we receive. In addition, the interest earned on that money during the years that it applies should be calculated as it is also owed to us. I request that I be paid for Merit Passes that were recommended to me and were never granted, Per Diems, Vacations and any other debts that are pending payment.

For this purpose, I submit the claim documents corresponding to "Schedule E - Case No. 17 bk - 03283" and "Schedule E - Case No. 17 bk - 03566."

Although the attorneys in the Wage Claim Lawsuit received a Schedule H notice, which they will be filing and documenting for mailing, I am submitting this letter and filing the above claims on the Schedules because I am interested in continuing as an active party in the Promesa Act case and to have my claim considered.

*Sincerely yours,
[signature]
Signa M. Cabrera Torres
Social Security: XX-XX-5242*

*Mailing Address
Calle Pellín Rodríguez 372
Villa Palmera, Santurce, P.R. 00915*

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Residential and mailing address:

Calle Pellín Rodríguez #372

Villa Palmeras, Santurce

San Juan, PR 00915

Cell phone number: 939-207-7594

September 21, 2020

Hon. Orlando López Belmonte
Secretary Department of the Family

Yours sincerely,

**Subject: Request for appeal status for correction of payments regarding Case Nilda Agosto
Maldonado v Dept. of the Family, K PE 2005-0608**

I recently saw a list extracted from the PRIME CLERK PROMESA website which includes all the plaintiffs, including those in the Nilda Agosto Maldonado Case, K PE 2005-0608. The amount assigned to me in the list for the correction of payments resulting from the case is \$19,661.53.

Based on that allocated amount of \$19,661.53, it could be inferred that the Department of the Family has not considered at all in the past 8 years the appeal that I filed by letter dated November 8, 2012, addressed to Ms. Maria L. Torres Colon, Assistant Secretary of Human Resources and Labor Relations, a copy of which I am enclosing herewith. I never received any reply or notice from the Dept. of the Family regarding my appeal which I thought they were considering. At that time the gross amount I received was \$7,696.65, equivalent to 25% of the total payment, and then I subtracted the social security and contribution deductions. The present figure of \$19,661.53 represents less than the remaining 75% I was allegedly owed.

In summary, the justification for my appeal as described in my 2012 letter, is due to the fact that my retired Social Work colleagues with similar years of service and classifications to mine received compensation for this claim much higher than mine, up to triple, as I was informed at the time and as I have confirmed again when I saw the above-mentioned list.

I will be sending a copy of this letter to Mrs. Glenda Gerena Rios, Administrator of ADFAN, in case she deems that she should also attend to this matter, or part of it. I wish to have my appeal reviewed and to receive the calculations that you made, or will make, in relation to my case. I hope that the present determination will be reevaluated, and justice will be done to me. When I filed the appeal in 2012, I sent a copy to the attorneys representing the plaintiffs and Pro-Sol (the union), and I will also send them a copy of this letter. I also filed an application for pension readjustment and have not heard anything back.

Sincerely yours,

[signature].

Signa Magali Cabrera Torres

SS #: XXX-XX-5242

C: Ms. Glenda Gerena Rios, ADFAN Administrator

Attachment: Copy of Request for Appeal dated November 8, 2012.

Copy of application for pension readjustment

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COPY

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3 pm

Stalyn

RECURSOS HUMANOS
RELACIONES LABORALES

2012 NOV -07 PM 1:41

Received
Nov. 13, 2012
2:10 p.m.

[hw.] Copy
Submitted at this [cut off]
of correspondence
[illegible]

Attorney

November 8, 2012

María L. Torres Colón
Human Resources and Labor Relations Assistant Secretary

This is to request an appeal regarding the payment received on November 7, 2012, as I do not agree with it.

I started working at the Agency as a Social Services Technician I in 1974. Then through the years I got the positions of Social Services Technician II and Technician III.

In the years 1992-1993 my position was reclassified to T.S. I and then to T.S. II receiving a differential in my salary. After that date I had applied for a T.S. III position and was never offered it and then I appealed, but never got an appointment even though I followed up on the case.

My retired colleagues who are T.S. received a very high compensation. Meanwhile, I received the minimum, [though] I have been with the Agency for a long, just like them. For this reason, I want my case to be re-examined and that I be given the real calculations that I obtained from it. Workers are worthy of their salary and require justice.

Looking forward to your prompt action.

[signature]
Signa Magaly Cabrera Torres
584-58-5242
939-207-7594
Calle Pellín Rodríguez 372
Villa Palmera

FAMILY

GOVERNMENT OF PUERTO RICO

***Office of the Assistant Secretary for
Human Resources and Labor Relations***

November 2, 2012

Cabrera Torres, Signa M.
Administration of Family and Children

Re: Nilda Agosto, et al. KPE-2005-0608

Dear Colleague:

You are a plaintiff in the case of Nilda Agosto, et al. v. Department of the Family, a Federal Minimum Wage Case.

Notwithstanding the foregoing, and in order to reduce the debt resulting from this claim originated for the year 2005, the Office of Management and Budget has identified some items within the savings accounts of the Department of the Family to be credited to your claim in the above-mentioned lawsuit. Enclosed with this letter you will receive a check for the amount of \$ 7,696.65 equivalent to 25% of the total payment to which you are entitled according to the stipulations of the judgment. Only Social Security and Contributions are being deducted from this check.

We recognize that this advance does not represent full payment, but rather a good faith payment for the purpose of reducing the amount owed.

If you do not agree with the amount received, you will have 10 days to file a claim with the Assistant Secretary of Human Resources and Labor Relations.

Cordially,

[signature]
Maria Luisa Torres Colon
Assistant Secretary

***Lila Mayoral Building, 306 Barbosa Ave.
P O Box 11398, San Juan, PR 00910-1398 / Tel. (787) 294-4900 Exts.: 2358 / 2359 / Fax (787) 765-1743***

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JUDGMENT
K PE 2005-0608
PAGE 17

73. BETANCOURT RIVERA, GLENDA LIZ	74. BETANCOURT RODRIGUEZ, ROSA E.
75. BIRRIEL URDAZ, NURI I.	76. BLANCO SOTO, MARIA A.
77. BONILLA CHISTIAN, ZAIDA	78. BORGOS DIAZ, MYRNA L.
79. BORGOS LEÓN LAURA	80. BORJA CLEMENTE, SAMUEL
81. BORJA GASTON, CARMEN R.	82. BOURDONY BAEZ, VICTOR M.
83. BRACERO RABASSA, RAFAEL	84. BRUNO RIVERA, GLADYS E.
85. BUNKER PEREZ, OSCAR	86. BURGOS MORALES, BRENDA LIZ
87. BURGOS RIVERA, JUAN JOSE X	88. CABALLERO MAISONET, MYRNA
89. CABAN ACEVEDO, JULIA A.	90. CABAN ARROYO, HERIBERTO
91. CABEZA HERNANDEZ, ÁNGEL	92. CABEZUDO PEREZ, IVONNE
93. CABRERA TORRES, SIGNA MAGALY:	94. CALDERON CARRASQUILLO, CARMEN V.
95. CALDERON CRUZ, CARMEN B.	96. CALDERON CRUZ, ENRIQUE
97. CALDERON DAVILA, CARLOS	98. CALDERON ILARRAZA, CARMEN X
99. CALO BIRRIEL, MILAGROS	100. CAMACHO GOMEZ, GLORIMY
101. CAMACHO PEREZ, JUDITH	102. CAMARERO COLON, JOSE L.
103. CANTRES APONTE, CARMEN S.	104. CARABALLO ORTIZ, LUIS A.
105. CARDONA MEDINA, WILSON	106. CARDONA SANTANA, GAMALIER
107. CARDONA SERRANO, ROSA I.	108. CARRASCO BAQUERO, MARIA L.
109. CARRASQUILLO DIAZ, YOLANDA	110. CARRASQUILLO MULERO, ROSITA
111. CARRASQUILLO PACHECO, LOYDA G.	112. CARRASQUILLO ROMAN, SONIA
113. CARRASQUILLO SANTIAGO, CARMEN R.	114. CARRERO LOPEZ, DAVID
115. CARRILLO FIGUEROA, ELIZABETH	116. CARRION CASTRO, MARGARITA I.
117. CARRION CEDEÑO, MARGARITA	118. CARRION SANTIESTEBAN, ARLENE
119. CARTAGENA MERCED, LUZ M.	120. CASTILLO ROMAN, SYLVIA
121. CASTRO CANALES, MIRTA X	122. CASTRO CARRION, BLANCA I.
123. CASTRO LAGUERRA, ANA VEDA	124. CASTRO RODRIGUEZ, ELIZABETH
125. CAY MORALES, MARIA	126. CEDEÑO ROMERO, EVELYN
127. CENTENO FONTANEZ, ROSA I.	128. CHEVERE FRAGUADA, ZORAIDA X
129. CHEVERE IZQUIERDO, SANDRA	130. CINTRON DE BORRALI, LILLIAM
131. CINTRON DIAZ, ADELMA DEL C.	132. CINTRON MORALES, JOSE A.
133. CINTRON RODRIGUEZ, ANGELITA	134. CINTRON SANTANA, JARVIS
135. CLAUDIO ROSADO, EDUARDO	136. COLLAZO GONZALEZ, CARMEN
137. COLON ARROYO, ANA A.	138. COLON DE OTERO, LETICIA
139. COLON DIAZ, RAFAEL	140. COLON ORTEGA, CARMEN
141. COLON RAMOS, RAMON L.	142. COLON RIVERA, ANA M.
143. COLON ROSARIO, MARGARITA	144. COLON SANTOS, KARITZA
145. COLON TORRES, NEYSHA M.	146. CONCEPCION LAGUER, MARGARITA
147. CONCEPCION QUINONES, JOSEFINA	148. CONCEPCION RODRIGUEZ, MARIA DEL C.
149. CORDERO AVILA, ÁNGEL G.	150. CORDERO FERNANDEZ, MARIA J.

Rev. Dec. 09 [logo] ASR

GOVERNMENT OF PUERTO RICO
ADMINISTRATION OF RETIREMENT SYSTEMS FOR GOVERNMENT
EMPLOYEES AND THE JUDICIARY
PO Box 42003 San Juan PR 00940-2203

PENSION READJUSTMENT REQUEST

O Initial O Revision

COPY
8 NOV 2012
4:13 PM
[signature]

SECTION I, RETIREE INFORMATION

Paternal and Maternal Last Names, First Name and Initial: [handwritten:] **Cabrera Torres, Signa M.**

Social Security: [redacted]

Birth (Day, Month, Year): [redacted] **1952**

Telephone: **939 207 7594**

Mailing Address:

[handwritten:] **372 Pellín Rodriguez St., Villas Palmeras Santurce 00915**

Development, Condominium or Neighborhood:

P O Box, No. and Street, Building and Apartment, Rural Route or Contract Route

City, Country, Postal Code

Residence Address: ☐ Same as Postal

[handwritten:] **22nd Street - V - 1157 - [illegible] Rio Grande [illegible].**

Development, Condominium or Neighborhood:

No. and Street, Building and Apartment, Highway, Kilometer and Hectometer

City, Country, Postal Code

Plan Accepted:

☐ Coordinated

☐ Complete Supplementation

First Retirement Contribution Withheld [handwritten:] **1976**

Separation or Resignation [handwritten:] **Retired December 31, 2007**

Effectiveness of Pension [handwritten:] **January 1, 2008**

Please complete this section if you were a police officer:

Number	
Lawsuits Requested	Order Requested

SECTION II CERTIFICATION

I CERTIFY that the information provided herein is clear and that I am aware that providing false information entails the application of penalties established by Law.

[signature]

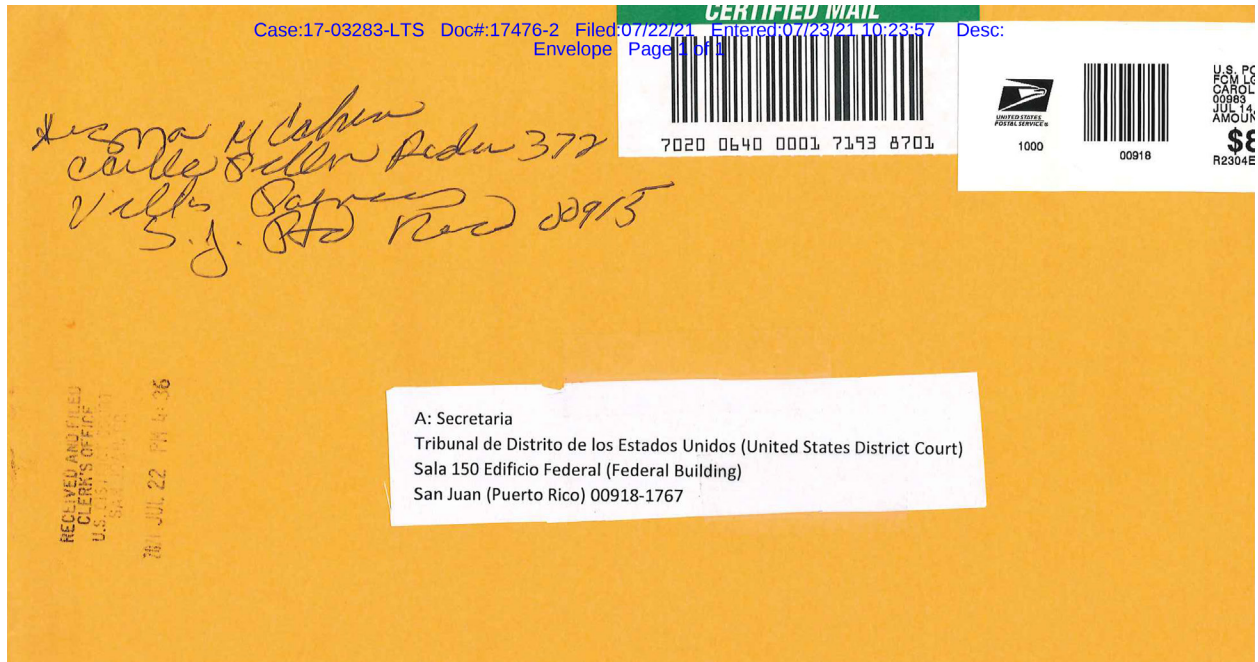
[handwritten:] 8 /nov/12

DOCUMENTS TO FILE WITH THE REQUEST

1. Pension Readjustment Request (ASR-PA-016)
2. Service Sheet (ASR-PA-004) without wages adjusted and discounts for Retirement
3. Service Sheet (ASR-PA-004) with wages adjusted and discounts for Retirement
4. Copy of payrolls where corresponding payment was affected
5. Change Report (OP-15)

Retention: Same as the file of which it forms part

[handwritten:] rec 8/11/12 [initials]





T 718.384.8040
W TargemTranslations.com
E projects@targemtranslations.com
A 185 Clymer St. Brooklyn, NY 11211

TRANSLATOR'S CERTIFICATE OF TRANSLATION

Translation from: Spanish (Puerto Rico) into English (US)
TARGEM Translations Inc.

I, Andreea I. Boscor, ATA-certified Spanish-English #525556, acting as translator at TARGEM Translations Inc., a NEW YORK City corporation, with its principal office at 185 Clymer Street, Brooklyn, NY, 11211, USA, certify that:
the English translated document is a true and accurate translation of the original Spanish and has been translated to the best of my knowledge.

Original Document Name: **Claim No. 12310**

Signed this 17th day of August, 2021



Verify at www.atanet.org/verify

A handwritten signature in blue ink, appearing to read "Andreea I. Boscor".

Andreea I. Boscor

